

IN THE MATTER OF
THE MARRIAGE OF

CHRISTOPHER MCCARTHY
and
DARCY GUSSE

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IN COUNTY COURT AT LAW

NUMBER TWO

WISE COUNTY, TEXAS

**RESPONDENT’S RESPONSE TO MOTION FOR ENFORCEMENT OF WISE COUNTY
STANDING ORDERS**

This Response is by Darcy Gusse, Respondent. The last three numbers of her driver’s license number are 999. The last three numbers of her Social Security number are 418.

The “Movant”, formerly listed as Petitioner in previous filing, is Christopher McCarthy.

1. Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

Preservation of Evidence: Respondent has preserve and not destroy, conceal, or alter any evidence or potential evidence relevant to the issues in this case, including tangible documents or items in Respondent's possession or subject to Respondent's control and electronic documents, files, or other data generated by or stored on Respondent's home computer, work computer, storage media, portable systems, electronic devices, online repositories, or cell phone.

2. This Court has continuing exclusive jurisdiction of this case as a result of prior proceedings.

3. “Movant”, Chris McCarthy, is the party entitled to this response, and process should be served to his legal counsel, Andrew Lloyd.

4. Respondent responds to each alleged violation with factual statements and evidence to support when available:

Addressing all “Movant’s” violation allegations and providing evidence to support Movant’s list is inaccurate and some partial information to the courts. Exhibits listed and attached.

Violation 1 Allegation: Movant’s daughter does not and has not resided at this residence or in the state of Texas and hasn’t for almost 2 years. Movant’s daughter is now over the age of 18 and has been for almost 2 years. Movant informed Respondent his daughter does not even communicate with him since she left. Movant stated to Respondent the week of May 14th that “he couldn’t speak about his daughter because it was a reminder of the sick things she did”. Yet Movant keeps injecting his daughter into these filings. Respondent did not inject or use Movant’s daughter as a prop in these filings, Movant is only responding with the facts about Movant’s daughter when he injects her into these filings. Movant is attempting to use and portray his daughter as the victim and falsely claim Respondent as the abuser.

Movant's daughter was exposed by Respondent that she was raping her dog, suspected of raping Respondent's dog. The daughter was also desiring to have sex with horses per her internet activity. This is documented by Google searches, online purchases and "shopping carts/wish lists" only at this time because Respondent could not and would not duplicate the actual illicit images she had stored on her phones and laptop, she only witnessed the vile imagery. Respondent was advised by a criminal attorney on this matter and the criminal activity of Movant's daughter, Respondent followed that attorney's legal advice. Those phones have since been obtained by Movant. She was fully addicted to watching hardcore vile pornography daily at the age of 12. Including rape, gang rape, incest, daddy/daughter, and mostly bestiality. His daughter was ordering and having sex props delivered to Respondent's home as she was a minor. Sick sex props including many dildos, vibrators, anal toys, lubricants, bleaching, bondage gear and was producing porn in Respondent's home and distributing it onto the internet. She was seeking to order in her "shopping cart" horse penis dildos and a "trans torso" for sex acts. She was seeking out older men of the age of 30 to have sex with her when she was 13 years old when she lived with her mother. His daughter's Discord bio was "I want piss and cum all over me". And much more. All legal matter on her devices fully documented. Movant is well aware of all this documented material, along with his daughter's sick behavior and criminal acts, along with her being well aware it was wrong because she was hiding it, lying about it and at first attempted to deny it. Movant agrees on audio she was doing these acts. For Movant to state they were "alleged" is negligent to the court. **EXHIBIT 1**

Violation 2 Allegation: It is fact. Respondent is not Movant's "dog shit and piss cleaner". Movant was demanding returns of his items after Respondent requested for returns of her items Movant removed without her approval. Movant removed the disconnects to the HVAC (at the time, Respondent didn't know why the HVAC wasn't operating) and refused to fix this. It was temps in the high 90s at the time, Respondent had no A/C or heat for months. and was living in a steaming living space upstairs in a metal building. Once cold came, Respondent had to use space heaters for heat for months, because Movant refused to allow Respondent to have disconnects. Movant would take them out of the box outside of the building. Respondent locked the box outside, Movant cut the locks and stole the parts continuously. Movant was aware of this fact and was intentionally forcing Respondent to live in those conditions.

Violation 3 Allegation: Movant was posting on his social media vile lies about Respondent along with rubbing it in Respondent's face how financially secure he was as he "buried her financially" and left her and all the animals to go without just to get a reaction. Movant was redirecting contracted LD-Builds funds to his new business as he left Respondent with the debt for those contracts and was posting it on Facebook how great he was doing with Respondent's contracted funds, like buying a new truck, going on vacations, going out to fancy expensive restaurants and more. **EXHIBIT 2**

Violation 4 Allegation: Movant was leaving insulting notes to Respondent, stealing Respondent's things during the daytime hours he and his employee were present on the property, and Respondent was responding to them. **EXHIBIT 3**

Violation 5 Allegation: Movant's daughter was walking around the property after outdoor showers with just a small towel on in front of people, mostly her father. She was also leaving out vibrators in the shop for her father to find. Movant has been documented google searching "jailbait porn" and "how young is too young to have sex with". Movant has been documented sexually gratifying himself to very young girls that resembled his daughter. The Movant became very aggressive, defensive, and secretive towards Respondent once his daughter moved in in 2022. Movant and daughter would lock themselves in the shop area, not allowing Respondent access, where they resided for weeks at a time. Respondent did not have a toxic relationship with his daughter, his daughter had one with Respondent, the daughter admitted to intentionally causing a rift because she stated she hated Respondent for no reason by Respondent and wanted her dad to herself. Respondent did not post that on the social media site, an anonymous poster did. Others are aware of all the history of Movant and his daughter's acts.

Respondent stated to Movant how we did not have proper living conditions for her to reside at the time he requested she move in with us in December of 2021. Movant provided an unlivable space for his

daughter for months; she was living in this space in squaller. Movant's daughter refused to maintain a somewhat cleaned space and rodents were living amongst that space because it was not sealed. Respondent did not approve of this living condition at all. Yet Movant and his daughter did approve it.

EXHIBIT 4

This has been addressed in prior filings. Movant did not return his daughter due to "toxic relationship with Respondent". Movant is on audio firmly stating he returned his daughter to Kansas because "She's a liability doing that shit. And I sent her up north to protect you and I sent her up north as a fuckin' consequence, and if you don't believe that, there really nothing I can say about it". Respondent can provide this audio to the court as to show how deceptive to the court Movant is. **EXHIBIT 5**
TRANSCRIPT OF AUDIO.

Violation 6 Allegation: Movant did steal Respondent's personal items. Movant grabbed Respondent's cell phone in March of 2024 and threw it, shattering the phone when Respondent attempted to end all interactions with Movant yet again, this was monthly Respondent was trying to end all interactions with Movant due to Movant's abusive treatment of Respondent. Movant did steal Respondent's replaced cell phone on December 15, 2024, and then searched how to hack the code, Respondent has photos of the YouTube search from Movant's account showing him trying to find out how to hack it. Movant forgot to log out of his YouTube account on Respondent's tv. On December 15, 2024, Movant also stole Respondent's hard drive with years of work on it and thousands of personal files and images that are dated for years. Movant did steal the disconnects to the HVAC when removed with the ex-parte order and continued to steal them. Movant's daughter addressed above did steal Respondent's Movado gold watch and admitted it. **EXHIBIT 6**

Violation 7 Allegation: Movant was bragging on social media and directly to Respondent how he was "getting pussy" all the time.

Violation 8 Allegation: Movant is on video and witnessed by Respondent's daughter bragging "what was her name Leighton, with the real big tits, oh that's right, Diana, mmmm delicious, can't wait to lick that." So, Respondent told him to get the fuck out of her life and go fuck Diana, and to leave her alone. All incidents occur when Movant is alone or with his employee and are on the Respondent's property. There is not one incident ever of Respondent disrupting Movant's peace or space at Movant's place of residence (Respondent is not even aware of Movant's address of residence), jobsite, or anywhere else for that matter. There is not one incident of Respondent pursuing to harass, intimidate or any other bad behavior towards Movant. All incidents are instigated by Movant. Movant is the violator of Respondent's peace and space at Respondent's place of residence. Deputy Savage and other deputies are aware of this and have pointed this out to both Respondent and Movant. Respondent's place of residence is "ground zero" for all incidents and Movant does not reside at the residence and was not approved by Respondent to operate his business at her residence in which her deeds restrict.

Violation 9 Allegation: Movant has not purchased any food for his chickens in over 10 months. Respondent has purchased all their food and cared for them daily for over 10 months, each bag costing approximately \$14-18/bag each week. Movant the day prior is on video telling Respondent to "go get another abortion, you baby killer". Respondent had to have a lifesaving abortion due to aggressive pre-eclampsia symptoms at 8 weeks. Movant was informed to not leave Respondent alone during the process, but Movant left Respondent alone to go play video games with his other kids.

Violation 10 Allegation: Post left anonymously that Movant is baselessly accusing Respondent of posting. Respondent does know that someone else posted it.

Violation 11 Allegation: Movant is on recording calling his daughter a stupid bitch. Respondent believes in text also. Movant has also called his kids much worse. Movant called his daughter stupid bitch because she left an Amazon review in full description of how great her 8" black dildo was that she purchased and used her real name. **EXHIBIT 5**

Violation 12 Allegation: Another anonymous post.

Violation 13 Allegation: Wise County Sheriff's department confirmed they investigated, and it was not a false report made by Respondent. Actually confirmed again by Deputy Houston on June 7, 2025. Respondent has texts where Movant confesses he had Respondent's gun without her permission the first time Movant stole it, then returned it. Then stole it a second time. Wise County deputies believe Respondent that he did steal it, and he covered it up by returning it and saying Respondent just didn't "look hard enough, it was under the mattress". However it was difficult to prove he stole it because it was not on video, and it was returned so deputies advised Respondent to let it go, and Respondent did. Respondent did in fact look under her mattress several times in a panic searching for the gun.

EXHIBIT 6

Violation 14 Allegation: Movant is the one that has been stealing Respondent's mail for years. Movant even stole the title to the 2017 Ford 350. Admitted it, returned it.

Violation 15 Allegation: Movant was doing this and accusing Respondent of doing it, it was soliciting casino mail.

Violation 16 Allegation: Movant was doing this and accusing Respondent of doing it, it was soliciting casino mail.

Violation 17 Allegation: Movant had changed his address for his mail. Parcel box is a rotted cedar wood junk box falling apart. **EXHIBIT**

Violation 18 Allegation: The livestock has always roamed freely on the 20 acres. Respondent has to allow the animals to roam freely on the property, for ag exemption that demands it (that is basic information for anyone with ag exemption or having even limited knowledge of ag exemption), they are not damaging the property or lessening its value. Movant is aware of these facts and has never complained before until this Motion. Movant is knowingly misleading the court with his alleged violations and "throwing everything at the wall and hope something sticks". Movant is actually the one in legitimate violation Deed Restrictions and of several Standing Orders repeatedly. **EXHIBIT**

Violation 19 Allegation: Movant's dogs destroyed that area for years, tearing out the insulation, defecating, urinating for years and he never once cleaned up after them, Respondent always did. **EXHIBIT**

Violation 20 Allegation: No, Movant's dogs did it years ago. Documented. **EXHIBIT**

Violation 21 Allegation: Movant is the one who removed all LD-Builds tools purchased over the years, along with Bobcat skidloader attachments worth thousands of dollars that LD-Builds purchased and none of this was "community property". Documented on video removing. Video can and will be provided if necessary.

Violation 22 Allegation: An accident. And Respondent informed Movant of that, and he said he was understanding of it and wasn't mad, that was only when Respondent was open to spending time with Movant and his attempt to work on reconciliation. As soon as Respondent ends reconciliation attempts by Movant, Movant "reports it as a violation". Respondent can no longer consider any kind of reconciliation with Movant due to his abusive acts, his fraud, his lies about incidents and false accusations of Respondent. Requesting the incarceration of Respondent with Movant's lies is the end of any kind of opportunity of an amicable relationship or any kind of relation or communications with Movant. Respondent wants Movant permanently removed from her life immediately with zero interactions.

Violation 23 Allegation: Movant is claiming junk and garbage as “property and family heirlooms”. Movant forced Wise County deputies to document garbage. A few items: coffee cup that Movant put cigarette butts out in, pencils, old half piece of a yellow raincoat, a broken piece of plastic and on and on. Movant was constantly ordering Respondent to “clean up the place”, Respondent cleans up the place and Movant falsely accuses Respondent of discarding his “property”. That is a reoccurring reality for Respondent for years. **EXHIBIT**

Violation 24 Allegation: Outright lie. Movant in November padlocked the garage doors open to snv on Respondent in the evenings. Filed in his previous Temporary Restraining Orders request that
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Respondent ordering to shut those same doors and now stating everything was exposed and risk of damage. Documented. Movant would always randomly leave doors open or closed, depending on his mood, yet Movant demands Respondent to follow his directive orders and not allow Respondent to have decision on doors’ positions. This is what Respondent has been trying to inform the courts of the controlling abuse and what her life has been like with Movant. Even down to the position of doors is only the Movant allowed to direct, and Respondent is to “obey” not be the decider. Movant even listed himself as “The Decider” on his business Facebook page. **EXHIBIT**

Violation 25 Allegation: Movant knocked over the fan in a fit of rage. Movant and employee scattered the trash. Staged event. **EXHIBIT**

Violation 26 Allegation: Respondent doesn’t know what this is.

Violation 27 Allegation: Yes, Respondent removed Movant’s meaningless “things” outside the shop (Actual Garbage, rubber boots, old painting supplies, lil remains inside bags of grout, tables with screws, etc) so Respondent could clean, and Movant was able to retrieve them as Movant had removed all important “things” to him already and it was over 95% of his “things”. One note that Movant is not informing the courts about is the dead pig he killed in a garbage bag Movant kept moving into the shop and leaving as to “reek up” the shop with a rotting carcass for Respondent to smell. Respondent would place it outside, Movant would place back inside. That tit for tat went on for days until Respondent had enough of Movant’s and his employee’s immature games and moved it to the other side of the building with all other things Movant is complaining about. **EXHIBIT**

Violation 28 Allegation: Yes, Respondent burned trash and worthless old material to clean up the property. Respondent wanted her home to look nice, not as it has with the way Movant and his employee were constantly leaving it, like a junkyard. Documented. **EXHIBIT BEFORE AND AFTERS**

Violation 29 Allegation: Movant was ordered by Respondent to no longer bring his employee that is on video threatening Respondent attempting to intimidate Respondent and calling Respondent in her own home “dumb slut, dumb fucking bitch, whore” and telling Respondent to go fuck her brother”. Movant supported his employee’s behavior and even defended it. Documented on video. Movant was also ordered to stop violating deed restrictions and operating his business at Respondent’s property. Several neighbors agreed that Movant needed to stop and they no longer wanted Movant’s employee in the area due to his intentionally leaving my gate open and putting them and Respondent’s cows at risk. Deed Restrictions #7 All lots shall be used solely for Residential Use. No business or commercial use shall be permitted. This restriction does not prohibit a private office within the main residence, but it shall not be used to conduct public business. Deed Restrictions #10 Each owner, family, occupants, tenants and guests shall comply with these restrictions. The restrictions may be enforced by any owner (this would be me), the developer, or the governmental entity in which the lot is located. The cost of curing any violation of the restrictions and any attorney fees, court costs, litigation expense. Movant is requesting Respondent to be removed from her property and displace 8 horses, 4 dogs and her daughter (where Respondent has nowhere to reside for herself and all the animals other than her own home) in order to violate Respondent’s deed restrictions and stop her from enforcing her deed restrictions. Along with bringing his

abusive employee back onto Respondent's property, as of now that person, Jerry Leighton Brooks is not allowed on Respondent's property after his abusive behavior, constant instigating conflicts between Respondent and Movant. **EXHIBIT DEED RESTRICTIONS**

Violation 30 Allegation: Repeated accusation.

Violation 31 Allegation: Setting out empty feed bags or bags of garbage outside is not a crime or civil offense. Nor is it a violation to this "Standing Order".

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Movant's third petition of divorce. Respondent was not hiding behind an ex-parte, Respondent had provided evidence of high-powered rifles aimed directly at her camper, Respondent's daughter witnessed Movant placing rifles pointed at Respondent's camper with only a window between the rifle and camper. Texts where Movant admits to firing his handgun at my two small puppies because they were "near his chickens locked up in the coop", then laughing about it. Movant texted to Respondent he would "destroy me financially, bury me financially", "destroy me, bury me", "bury me in legal fees", "leave me penniless". Movant is on audio recording inquiring if the insurance policy to the shop is paid up and attempting to convince Respondent to join him in burning down the shop to collect the million-dollar insurance policy. Respondent refused. Movant is NOT joking. Movant confirms that in the audio. Movant described to Respondent how he knew how to get rid of a body, by taking it out west Texas and feeding it to wild hogs. **EXHIBIT**

Violation 33 Allegation: Movant and his employee were intentionally leaving the gate open and the cows were going out in the road. Putting them, my neighbors at risk and me at liability risk. Documented.

Violation 34 Allegation: Movant and his employee were intentionally leaving the gate open and the cows were going out in the road. Putting them, Respondent's neighbors at risk and Respondent at liability risk. Documented. Wise County Sheriff's deputies had to intervene to stop their gate antics by a deputy taking it as serious as it was and sternly informing Movant if the Deputies get one more call of Respondent's livestock out, they would fine him only maximum penalty for each head out, each incident. The gate has not been left open since that call and Respondent's livestock have not been out since.

Violation 35 Allegation: Movant did NOT own a 2021 Kawasaki Mule Pro FXT. Documentation with Synchrony Bank proves this as fact. Nothing was or is community property for Movant had not proven in a court of law that a common law exists, nor does Movant meet the requirements of common law marriage. Movant's own attorney acknowledged this fact in the conference meeting between Respondent and her legal counsel, after Respondent's own legal counsel stated this also. This may or may not be documented.

Violation 36 Allegation: Movant and his employee had been harassing Respondent for months, threatening her, intimidating her, stealing and breaking her and her daughter's things (her daughter's Starlink and game cams, and many Respondent's things). Movant had stolen Respondent's recently purchased groceries (all of it in the frig) and threw it away at his jobsite, hundreds of dollars of groceries on many different occasions. Movant had threatened to destroy Respondent's truck many times, Respondent would park her truck inside to be sure it was safe at night and to prevent Movant from sneaking in early or late to steal her food or other things. Movant was always nasty and aggressive when barking orders for Respondent to move the truck if it was not moved prior to his arrival, Movant has never requested politely.

Violation 37 Allegation: Movant shutting power off to Respondent's living space and her daughter's camper. There was a deep cold snap that day, 30 degrees, when Movant arrived onto the property and shut off all the property with no other communication. Once Movant shut off all the power,

he continued yelling as loud as he could barking orders to Respondent to move her truck NOW. Respondent and her daughter had to record Movant that day as Movant was having a complete emotional meltdown. Movant attempted to drill out the electrical panel to begin removing circuit breakers. Movant lied to the person on the other end of his phone that Respondent was blocking him in. Video evidence clearly shows Respondent was NOT blocking Movant in. Movant then attempted to drill out the door lock to Respondent's living area to repeat throwing all of Respondent's belongings over the balcony again. Respondent was having to constantly follow Movant around the property to record him and order him to stop attempting to sabotage utilities and property. Movant began hurling insults at Respondent and her daughter repeatedly, even stating to Respondent "raise your hand if you ever had 2 abortions", because Respondent had to due to life threatening pre-eclampsia, Respondent only returned insults back until Movant stopped. All documented on video.

Violation 38 Allegation: Respondent sold a planer that LD-Builds purchased for \$700, and Movant never used once and stated many months prior how he should sell it, Respondent sold it to buy food for her to eat, Respondent did not have any money to buy herself food. This is a perfect example of Movant's contradictions that deputies have pointed out, Movant claims "his property" is separate property, but Respondent's "property" is community property. Respondent has always remained consistent: there is no "community property" because there is no common law marriage. Respondent had been shelling out approximately \$7,000 per month on debt and expenses that Movant was not assisting with at any capacity and Respondent had no income at the time. When Respondent was cooperating with Movant's attempt to reconcile, Movant stated he understood and was sorry for being upset about it. Once Respondent ended reconciliation attempt due to Movant's continuance of abuse and control, Movant now claims this as a "violation". Movant did not care that Respondent had no money to purchase food or to replace food he stole. Movant is accused in his child custody case of also controlling his ex and their children with food. His ex stated he put a strap on the frig with a padlock as so she could not eat food "he" purchased. He denied it but all three kids verified this to Respondent to be true years later. It's in the transcripts and he has a copy of the transcripts.

The doors and windows, Movant said "good job selling those doors and windows, glad to see them gone." Movant even helped load up the doors and windows to the elderly gentleman who purchased the doors and windows. Along with the fact those doors and windows were LD-Builds' materials, Respondent's solely owned company. Hand tools and power tools purchased by LD-Builds that all work are in the illegal possession of Movant. There is no community property, because there is no marriage.

Violation 39 Allegation: Movant has no rights to operate his business at Respondent's residential property that specifically states in the deed restrictions "No business can operate at these properties". Respondent is the sole deed owner and did not give Movant permission to locate his business address as her residential address, nor did Respondent ever give Movant permission he could operate his business at her residence.

Violation 40 Allegation: Respondent had been barricading doors because Movant continued on many occasions to steal all of Respondent's groceries the day following her purchasing and throw them away. Movant and his employee had just days prior threatened, harassed and intimidated Respondent in her home. Movant employee calling her a "dumb fucking bitch, dumb slut", telling her to go fuck her brother, and stating he was "going to go turn this bitch into the IRS". Knowing Respondent did not have access to her Quickbooks or invoicing, due to the fact Movant refuses to turn over that information and allow Respondent access to her business' books and cannot file her taxes. Movant withdrew from Respondent's business account over \$27,000 cash in one day, on April 3, 2024, the day, he had his attorney file the initial claim of "common law divorce". There is no invoicing, there is no confirmation or information on where this \$27,000 cash went and what Movant did with it. All documented on video.

EXHIBIT

Violation 41 Allegation: Yes, Movant was not getting the message that Respondent would no longer allow him to violate her deed restrictions nor allow him and his employee to disrupt her peace in

her home, disrupt her studies/research for a new career in IT management and cybersecurity, or threaten and harass her. No one else was stopping their horrible behavior and treatment of her for that past 8 months that she had to endure. For the first 3 months Movant and his employee would harass Respondent, break her down emotionally into shaking and tears and shove a phone in her face and record her as they laughed at her.

Violation 42 Allegation: Yes, cows sold. Respondent could no longer afford to feed them; Respondent was NOT going to watch them starve! The bull was getting aggressive after Movant's employee left the gate open, the bull got out and he got in with the neighbor's cows and got wild. Respondent's neighbor, Chuck Nichols was frustrated with them as her bull was a dwarf and attempting to breed his larger cows in which would throw smaller calves, costing him money in cattle weight. Respondent also sold them because she couldn't risk getting physically hurt at the age of 53. Movant had not contributed one cent to feeding any animals or assisting with their care and maintenance in years, Respondent's company profits paid for them. Movant was aggressively ordering Respondent to sell the loing
, as
many other violations he listed.

Violation 43 Allegation: Same with this violation, Movant is using this as a means to manipulate the courts as him a victim. Cody was given to Respondent as a horse rescue by Troy Ashpole. He is a long-time neighbor and friend of Respondent's family. When Respondent rescued Cody he was 4 years old, wild, still a stud. Respondent took Cody in, Respondent assisted in his gelding, Respondent paid for his board, Respondent paid for his food, and Respondent performed all his daily chores. Cody was rescued, ground trained, vetted to be sound and shipped to Florida to perform as a jumper under the agreement with Respondent's friend, Meredith VanBenthuyzen. This agreement was made the week Respondent rescued Cody. When Movant lost custody of his kids Respondent gave him the opportunity to train him to get his mind off losing his kids, Movant had no knowledge of training horses, Respondent had to teach him how to train Cody. Movant does not inform all the facts. Movant was informed throughout the entire ground training to not get attached to the horse for he was to be shipped to Florida to perform as a jumper. Movant at that time did get attached. It was decided to keep Cody then. Movant's daughter had no interest in Cody ever. Photos by Movant were only staged to publish on Facebook to "rub it in" to his ex. Movant did not "break" Cody. He rode him his initial ride and was thrown off after not following Respondent's advice to not transition into a trot, Movant did anyways, Movant suffered a concussion. Respondent trained Cody for riding and Respondent have been Cody's main rider always. Once shipped to Texas Cody around 7 years ago he developed pruritus (sweet itch). Cody suffers from this, he is miserable in this region. Respondent and Dr. Harvey and other vets have tried to remedy his medical condition with no progress. The only way to remedy Cody's suffering condition is to ship him back to the region he originated. So, Respondent began to do that for Cody. Respondent only rehomes horses to qualified, verified forever homes with a contract for first right of refusal. And Respondent follows up on their status. Movant is aware of all this truth and yet denies acknowledging any of it and also is denying to the courts the fact that he supported and approved for Cody to be homed to a wonderful, loving family for a beautiful 5-year-old girl that her dream is to have a "yellow horse" like "Spirit". Cody is identical to Spirit, and she is so excited and grateful to have Cody that she asked her mom to take a picture of her with her "yellow chicken", send it to Respondent and tell Respondent how excited she is to also have her "yellow horse, Cody" soon to love on him every day as she does her "yellow chicken". Cody is going to this little girl; Respondent will not allow anyone to break this little girl's heart. Movant and his daughter have nothing, not a thing to do with Cody and haven't in over 6 years. Movant hasn't purchased a blade of hay for Cody, hasn't fed him once in years, hasn't given him fresh cold water in years, hasn't brushed him in years, not a thing for Cody in years. Respondent has done all of this for Cody several times a day for years. This rehome of Cody has nothing to do with Movant and Respondent, this has to do with the best interest in Cody's health and a beautiful little girl's dream.

EXHIBIT

Movant had been attempting to publicly humiliate and shame on his Facebook of Respondent as "broke"

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post and laugh with others on his social media how Respondent was a failure and broke. After the direct reason for this unpaid debt is the act of this lawsuit which is fraud and based on lies and a lien put on my property, the fact that it has been dragged out going on for 10 months now and yet there has not been a trial date set to prove Movant's claim.

Honorable Judge Wren scheduled Respondent's trial date filing for the proof of the existence of common law marriage with her husband (now ex-husband) in 2013, 60 days out of filing. Respondent proved common law marriage with means of tax returns, health and life insurance policies (listing each as spouse), Cycle News articles, audio recordings of husband, his mother, his sister, and his best friend's wife ALL acknowledging a marriage existed and Respondent was in fact his "wife". None of this exists between this Movant and Respondent. Honorable Judge Wren ruled the marriage date of the health insurance policy, stating he needed a date to put on the marriage certificate and he needed official documentation to the point when a marriage was acknowledged by both parties. Honorable Judge Wren also informed the courts that an "engagement" is not a marriage. Transcripts of this will be provided if needed.

Violation 45 Allegation: Respondent removed Movant from LD-Builds account and shut down personal account due to no funds and per the advice of Respondent's bankruptcy attorney to stop the hemorrhaging of funds unethically by "Movant". To prevent further financial damage by "Movant" that had not only threatened to destroy Respondent financially but was also following through with it. It was not "Movant's" company, it was Respondent's company. Respondent is the sole 100% owner/member of LD-Builds LLC. Movant did not contribute to paying this creditor, because he did not see debt to creditors as "community debt", any accounts in Respondent's name, Movant seen that as "separate" debt because Movant does not acknowledge a marriage or "community property" unless it is an asset with equity that Movant can "acquire" through this fraudulent lawsuit he filed against Respondent. The American Express account was ran up to over \$8,400 by Movant, Movant charged alcohol, cigarettes, client material, and much more and did not pay the balance due with LD-Builds contracted funds from clients. Instead, Movant redirected and misappropriated that LD-Builds contracted funds from clients and deposited into his personal and Great Works company, leaving Respondent the responsibility to pay this debt. In mid to late September or October American Express was demanding full late payment of balance that was not available to me. American Express put Respondent on a payback program of \$220 per month and stipulations of that program was the cards would be temporarily shut off. Movant was aware of this debt he ran up and was informed of this fact of the payback program by Respondent and is intentionally manipulating the courts with his Violation 45 statement. To this day Movant has the login to review that information on the account. Login for this account has never changed. Movant refused to offer to pay for any debt or bills other than some land payments, the power bill, and the Nextlink bill that he would not give Respondent the login.

Violation 46 Allegation: Movant is yet again not stating all the facts. Movant came over to talk and discuss a resolution, we were talking and because I was not obeying Movant's directed orders, Movant became enraged, insulted me and my sister and attempted to leave, I stood behind his truck and told him he needed to calm down, that is not how things get resolved and have an adult conversation. Movant calmed down, got back out of the truck calmed, but again began barking orders at me as I denied his orders he again got enraged, got in his truck and I let him leave.

Violation 47 Allegation: October 4, 2025, hasn't come yet. Movant is not explaining to the courts "why" he would not enter Respondent's personal space without her permission. It was always two on one, Movant and employee ganging up on Respondent who was always home alone, Respondent was constantly having to call her daughter to leave her place of employment, The Pet Health Center, to assist

Respondent and witness Movant and his employee's behavior and attacks. Movant in mid November of 2024 entered the shop with his employee as Respondent was playing hoops, Movant proceeded to enter Respondent's living space and began aggressively throwing out everything of hers he could out over the balcony as his "employee" Leighton recorded it with his phone. Respondent had to call 911 for help. As Respondent begged Movant to stop while on the phone with 911 as Leighton glared down Respondent aiming his phone right at her, recording Respondent hysterically in fear and crying and was laughing. Movant was full of rage and aggressive and did not stop until everything he could grab was thrown out over the balcony, breaking many personal things. Deputy Savage was the arriving officer with one other. Deputy Savage had already been updated on this situation days prior with supporting evidence. Deputy Savage was the officer who inspected Respondent's "returned" handgun, that Movant "found" under Respondent's mattress. Deputy Savage witnessed Movant's tyrant results. After Deputy Savage dominated the situation, he asked Movant why he did it, Movant's response was "she's winning in court". This was after Respondent filed Movant's bankruptcy as an exhibit along with texts supporting Movant admitting they were not married. Movant's employee would glare down as to intimidate Respondent directly in front of both deputies and Deputy Savage aggressively reprehended him immediately for it and ordered him to stay out of it and stop instigating issues between Movant and Respondent, but that only lasted 2 weeks. Deputy Savage ordered Movant to stay out of Respondent's living space and to never do this again or he would arrest him. That is why Movant would not enter the living space of Respondent at that time. Respondent is currently working on providing the 911 call and police report.

Violation 48 Allegation: Respondent did not cancel the property insurance. The policy expired, and there were no funds to renew a new policy. Movant did not inform Respondent of any insurance policy he acquired with no rights to do so. Movant is on audio recording attempting to convince Respondent to burn down this shop for the insurance money. He makes it very clear that he is serious. Respondent even tested him in that conversation that proved Movant was serious. And that wasn't the only time Movant had brought that up, it was just the only time Respondent got it on recording.

Violation 49 Allegation: Movant is directly violating Respondent's deed restrictions attempting to operate his business at Respondent's address and was not given approval to do so by me the sole deed owner. Respondent did not sell "his" tools, Respondent sold \$500 of LD-Builds, Respondent's sole owned company tools in September of 2024 prior to being served this petition. Respondent did not damage or destroy any tools or materials. Respondent cleaned her shop. It was filthy from Movant and his employee that never cleaned. Documentation proves this.

PRAYER

Movant was arriving to the residence of Respondent just the week of 12th to the 16th of May stating he desired a "reconciliation" with Respondent but was only pressuring Respondent daily to allow Movant's employee, Leighton, back onto Respondent's property. Respondent denied Movant's request repeatedly. The same employee that just a couple months ago threatened to "turn this bitch into the IRS", called Respondent a "dumb bitch, dumb slut" in her own home. Movant offered a "birthday gift" to Respondent on her birthday of May 14th, the gift Movant stated was "dropping this lawsuit". Movant asked Respondent "Wouldn't that be nice to have on your birthday?". Movant refuses to allow Respondent to have boundaries from abuse and standards of respect from Movant and his employee even in her own home.

Respondent is requesting the court to acknowledge the fact that Respondent's daughter has not been listed at any point for being in violation of standing orders, or listed as an instigator, or listed as harassing, or listed as intimidating Petitioner. However, Petitioner's employee is listed many times for being in direct violation of standing orders, evidence shows employee is harassing and threatening and calling Respondent vulgar/offensive names in her home, also putting Respondent's neighbors and livestock's lives at risk and Respondent at liability risk. Also witnessed as intimidating and instigating

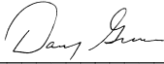
conflict between Respondent and Petitioner by others, including Deputy Savage with the Sheriff's department of Wise County.

Respondent has officially filed Chapter 7 under Federal Bankruptcy court case number 25-41572 as of May 2, 2025. Respondent's real property, where Respondent is the sole deed owner, is officially under a "stay" with the Federal Bankruptcy court and Respondent does not have any other place to reside, nor the funds to acquire another residence. Respondent would also be severely disrupted in her training as an IT management & cybersecurity sales representative. Respondent's only means of income at this time. Movant is and was informed of all this information by Respondent as of May of 2025.

Respondent prays this court does not hold Respondent in contempt and punish as requested.

Respectfully submitted,

RESPONDENT'S RESPONSE TO MOTION FOR ENFORCEMENT - PAGE 10



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EXHIBIT 4

Movant's daughter's living space that Defendant did not approve. (Approximately a 10 x 10 unfinished
RESPONDENT'S RESPONSE TO MOTION FOR ENFORCEMENT - PAGE 11





EXHIBIT 4

Movant's daughter's living space that Respondent did not approve. (Approximately a 10 x 10 unfinished area. This unfinished space was the closet in the drawings)



As you can see little miss will be so excited for her own "yellow horse". She already has her own yellow chicken



+ RCS message



Oh my goodness! Absolutely adorable. Well let's make her dream come true! She will have a real "Spirit" horse.. he will actually be gold, even better! Ha



Just tell her he's like Spirit when

+ RCS message



CERTIFICATE OF SERVICE

I certify that on _____, a true and correct copy of the foregoing document was served to each party of this suit pursuant to the Texas Rules of Civil Procedure. Fax to Andrew Lloyd Law Office.

/s/ Darcy Gusse
Darcy Gusse